

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

NETLIST, INC.,)	
)	
Plaintiff,)	
)	Case No. 2:22-cv-293-JRG
vs.)	
)	JURY TRIAL DEMANDED
SAMSUNG ELECTRONICS CO, LTD;)	(Lead Case)
SAMSUNG ELECTRONICS AMERICA,)	
INC.; SAMSUNG SEMICONDUCTOR)	
INC.,)	
)	
Defendants.)	

NETLIST, INC.,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 2:22-cv-294-JRG
)	
)	JURY TRIAL DEMANDED
MICRON TECHNOLOGY, INC.; MICRON)	
SEMICONDUCTOR PRODUCTS, INC.;)	
MICRON TECHNOLOGY TEXAS LLC,)	
)	
Defendants.)	

**DECLARATION OF YANAN ZHAO IN SUPPORT OF NETLIST, INC.'S
MOTION TO COMPEL PRODUCTION OF MICRON DEFENDANTS'
DOCUMENTS RELEVANT TO DAMAGES**

I, Yanan Zhao, declare as follows:

1. I am an attorney at the law firm of Irell & Manella LLP, counsel for Plaintiff Netlist, Inc. (“Netlist”) in the above captioned action. I am a member of good standing of the State Bar of California and have been admitted to practice *pro hac vice* before this Court in this action. I provide this declaration in support of Netlist’s Motion to Compel Production of Micron Defendants’ Documents Relevant to Damages.

2. Attached as **Exhibit 1** is a true and correct excerpted copy of a July 12, 2023 letter from Netlist’s Counsel to Micron’s Counsel

3. Attached as **Exhibit 2** is a true and correct excerpted copy of Netlist’s Responses and Objections to Micron’s Second Set of Interrogatories (Nos. 16-32), which was served on November 13, 2023.

4. Attached as **Exhibit 3** is a true and correct copy of an email from counsel for Netlist to counsel for Micron dated November 17, 2023.

5. Attached as **Exhibit 4** is a true and correct excerpted copy of the September 20, 2023 deposition of Robert Beal.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on November 20, 2023, in Los Angeles, California.

By /s/ Yanan Zhao
Yanan Zhao